

GUIDO SAVERI (22349)  
R. ALEXANDER SAVERI (173102)  
GEOFFREY C. RUSHING (126910)  
CADIO ZIRPOLI (179108)  
SAVERI & SAVERI, INC.  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE DYNAMIC RANDOM ACCESS  
MEMORY (DRAM) ANTITRUST  
LITIGATION

This Document Relates To:

All Direct Purchaser Actions

Master File No. M-02-1486PJH

MDL No. 1486

**STIPULATED DISTRIBUTION  
NOTICE AND [~~PROPOSED~~] ORDER  
REGARDING HYNIX CLASS  
NOTICE COSTS**

Time: 9:00 a.m.

Date: April , 2007

Judge: Hon. Phyllis J. Hamilton

Courtroom: 3

Pursuant to Paragraph 6(c) of the May 22, 2006 Escrow Agreement by and among Hynix Semiconductor, Inc. and Hynix Semiconductor America, Inc. ("Hynix"), plaintiffs and Union Bank of California, N.A. (the "Escrow Agent"), the Escrow Agent is hereby authorized to make the following distribution out of the Hynix Settlement Escrowed Funds in connection with Hynix's share of incurred class notice expenses:

- i. \$16, 508.86
- ii. To Complete Claim Solutions, LLC  
5210 Hood Road  
Palm Beach Gardens, FL 33418
- iii. Pursuant to Paragraph 9, 18(a) and 20(a) of the Settlement Agreement.

**Hynix:** **Hynix Semiconductor, Inc.**

By: Michael F. Tubach  
Name: MICHAEL F. TUBACH  
O'MELVENT & MYERS LLP  
COUNSEL FOR HYNIX

**Plaintiffs:** **Saveri & Saveri, Inc.**

By: Guido Saveri  
Name: GUIDO SAVERI

**IT IS SO ORDERED.**

Dated: April 17, 2007

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